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February 25, 1998



Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, D.C. 20204

**RE: SECTION 403(r)(6) NOTIFICATION**

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, the Knox Company, a unit of Nabisco, Inc., notifies FDA that it uses the following statements:

"Knox NutraJoint works with your body's natural renewal process to help rebuild cartilage and keep you flexible.\* It's a dietary supplement formulated with a special gelatine combined with vitamin C and calcium."

***"Q. How does Knox NutraJoint work?"***

"A. The special gelatine in Knox NutraJoint supplies important building blocks needed for the production of collagen, a key component of joint cartilage. With the help of vitamin C and calcium, collagen provides the foundation for cartilage and the structure for bones. Together these nutrients help keep joints flexible and bones healthy.\*"

"The special gelatine in Knox NutraJoint supplies important building blocks of cartilage, the protective cushioning in joints."

***"Q Who should take Knox NutraJoint?"***

"A. Knox NutraJoint is for everybody who wants to help keep his or her joints flexible. It is appropriate for people who:

- Are physically active and exercise regularly
- Experience some joint stiffness as part of the natural aging process
- Have stressed joints due to extra weight
- Want to do all they can to stay flexible"

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***"Q. How long does it take Knox NutraJoint to work?"***

"A. Clinical studies indicate, if you take Knox NutraJoint every day as recommended, you may notice increased flexibility in as little as two months. \*"

"As part of your daily program for flexibility, eat a well-balanced diet, include regular physical activity, and remember to take Knox NutraJoint every day. It's the Formula for Flexibility.™"

"If you're concerned about joint stiffness, you should be using Knox NutraJoint. Knox NutraJoint works where joint stiffness begins – in cartilage – the protective cushioning in joints."

"Knox NutraJoint is a dietary supplement that works with your body's natural renewal process to help rebuild joint cartilage. It's formulated with a special gelatine combined with Vitamin C and Calcium, nutrients that aid in the process of maintaining flexible joints and healthy bones. Clinical research indicates that you may notice increased flexibility in as little as two months when you take Knox NutraJoint every day as recommended.\*"

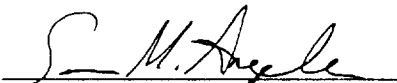
"Knox® NutraJoint™ is the Formula for Flexibility™"

These statements contain the statutory disclaimer. As the above statements indicate, the name of the product is Knox® NutraJoint™ Gelatine Dietary Supplement, and the relevant dietary ingredients are gelatine, vitamin C and calcium.

I certify that the foregoing is complete and accurate, and that Nabisco, Inc. has substantiation that the statements are truthful and not misleading.

Very truly yours,

THE KNOX COMPANY,  
a unit of Nabisco, Inc.

By:   
Susan M. Angele  
Chief Food & Drug and  
Trade Regulation Counsel  
Nabisco, Inc.

SMA/lgs